

Requests for consumer consumption information

Procedures

18 November 2015

Version control

Version	Date amended	Comments
1.0	9 June 2015	Final for publication
1.1	15 September 2015	Clarification to paragraphs 8 and 10 to clarify 'available' information
1.3	27 October 2015	Clarification to paragraphs 4 and 5 to clarify the information required under Code reference clause 11.32A. A few other related changes also made in document for consistency
1.4	18 November 2015	Minor change to correct incorrect Code clause reference in paragraphs 17 and 23. These paragraphs incorrectly referred to Code reference 11.32B(4), when the correct Code reference is 11.32B(3).

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Introduction

1. Clauses 11.32A to 11.32F of the Electricity Industry Participation Code (Code), which are effective from 1 February 2016, require retailers to give consumers information about their own consumption of electricity upon that consumer's request. This document sets out procedures that apply to retailers when they respond to such requests. The document also contains information that will assist consumers and their agents to make requests for consumption information.
2. A "retailer" includes any participant that supplies electricity to any other person for any purpose other than for resupply by the other person. This definition includes retailers that purchase electricity from any other person to on sell to a consumer.
3. Any questions about this procedures document should be directed to the Market Operations Team by email to marketoperations@ea.govt.nz.

What information must retailers provide?

Code reference: clause 11.32A

4. If a retailer has supplied a consumer in the past 24 months, the retailer must give the consumer (or their agent) the following information on request:
 - (a) information used by the retailer to calculate the amount of electricity conveyed to or from the consumer at each installation control point (ICP) where the retailer supplied electricity to the consumer
 - (b) information used by the retailer to provide a service to the consumer about the amount of electricity conveyed to or from the consumer at each of the ICPs where the retailer supplied electricity to the consumer.
5. An example of a service to a consumer is a secure website that provides consumption information. This consumption information could be non-half hour (NHH), half hour (HHR), or more granular information (eg, 15 minute interval consumption data).
6. A retailer must provide consumption information regardless if this information is validated or not.
7. Monthly aggregated consumption information will usually be 12 records a year. HHR consumption information will usually be 17520 records per year. More granular consumption information will be greater again (eg, 35,040 records per year for 15 minute interval metering information).
8. If used by the retailer, as described in paragraph 4, the retailer must provide both:
 - (a) import (consumption) and export (generation) information
 - (b) real and reactive energy information.

What if a consumer switches retailers?

9. The example included in Figure 1 shows a timeline that includes a retailer switch situation, where a consumer is initially supplied by Retailer A but later switches to Retailer B. After the switch, Retailer A (the losing retailer in the example) is still required to hold consumption information for its former consumer, but for a diminishing period of time. Once 24 months has elapsed from the date of the switch, Retailer A has no further obligation to hold information for the consumer.¹
10. Retailer B picks up the obligation to hold new information for the consumer it has won from Retailer A, starting from the switch date. The amount of information Retailer B is required to hold builds up until 24 months has elapsed from the switch date, at which point it must always retain at least the last 24 months of information.
11. Within 24 months following a retailer switch, a consumer that seeks all of its consumption information will need to make at least two requests; one request each to Retailer A and Retailer B and possibly additional requests to subsequent retailers if the consumer has switched more than once in the 24 month period. When aggregated, the information received by the consumer or agent should be contiguous across the switch date(s).

When must a retailer provide consumption information to a consumer?

Code reference: clause 11.32B

12. A request from a consumer or its authorised agent (collectively referred to in this document as the 'requester') will trigger provision of the consumer's consumption information by a retailer. Each retailer will need to design a business process to manage consumer requests for consumption information.
13. Retailers must provide the requested consumption information to the requester no later than five business days after receipt by the retailer of a complete application. A complete application must contain all information reasonably required by the retailer to verify the proper identity of the consumer to which the request applies.

How can a consumer request its consumption information?

Code reference: clause 11.32B

14. A consumer must be able to request its consumption information by:
 - (a) phone call to the retailer
 - (b) written request to the retailer, transmitted by email or post.
15. In addition to the methods identified in paragraph 14, if the retailer has provided a suitable facility, a consumer may request its consumption information by electronic request, eg via a website or a smartphone application.

¹ At least, the retailer has no further obligation *under this section of the Code*. See Clause 18 of Schedule 15.2 for archiving and storage of raw meter data.

16. If a consumer authorises an agent to act on its behalf to request the consumer's consumption information from a retailer, the agent is encouraged to make the request by transmitting an electronic request formatted in accordance with Electricity Information Exchange Protocol (EIEP) 13C and transmit this to the retailer via the EIEP transfer hub (EIEP hub).

Can a retailer charge a fee for providing consumption information?

Code reference: clause 11.32B(3)

17. A retailer may impose a reasonable charge only if the consumer (including any agent acting on behalf of the consumer) has made more than four requests in the preceding 12 months. If both an EIEP13A and an EIEP13B are requested via an EIEP13C these requests must be counted as a single request for the purposes of subclause 11.32(B)(3) if the requests are submitted on the same day.

When must a retailer advise its consumers of the availability of consumption information?

Code reference: clause 11.32C

18. At least once in each calendar year, each retailer must notify each of its consumers of the consumer's right to access its consumption information. Retailers should notify their consumers using the method they normally use to communicate important information to individual consumers.

What must retailers do to keep information secure?

Code reference: clause 11.32D

19. Clause 11.32D requires the retailer to:
 - (a) be satisfied as to the identity of the consumer making the request for consumption information
 - (b) ensure that only the requestor receives the information.
20. Each retailer must develop and implement processes that ensure that only the appropriate consumer or its agent receives consumption information provided in accordance with clause 11.32B. This process must comply with the Privacy Act 1993 and should implement good business practice.
21. For clarity, if the requester subsequently provides the consumer's information to any other party, these information security obligations become the responsibility of the requester.

What if the request comes from a consumer's agent?

Code reference: clause 11.32E

22. A consumer may authorise an agent to request the consumer's consumption information.

23. A consumer's authorised agent is encouraged to use EIEP 13C to request consumption information on behalf of the consumer. The request must specify whether information formatted with either EIEP 13A or EIEP 13B is required. If both formats are required, this can be achieved by submitting two requests within the one EIEP 13C. This request must be counted as a single request for the purposes of subclause 11.32(B)(3) if the requests are submitted on the same day.
24. Each retailer must ensure that a requesting agent is properly authorised by the relevant consumer before any information is provided to the agent.

What format and transfer method must the retailer use to provide consumption information?

Code reference: clause 11.32F

25. Clause 11.32F(1) requires that the Authority must publicise, and keep publicised, procedures for responding to consumer requests for consumption information.
26. The Authority's published procedures consist of:
 - (a) this document
 - (b) EIEP 13A, which specifies the electronic format that must be used when providing detailed consumption information electronically to consumers or their agents. This format also provides for the retailer to respond to the agent if the retailer rejects the request.²
 - (c) EIEP 13B, which specifies the formats that must be used when providing summary consumption information either electronically or in printed form to consumers or their agents. This format also provides for the retailer to respond to the agent if the retailer rejects the request.
 - (d) EIEP13C, which is the electronic request file format that an agent may use to request a consumer's consumption information from a retailer.
27. EIEP 13A, EIEP 13B and EIEP 13C are published on the Authority's [website](#).³

EIEP 13A: Detailed electricity consumption information for consumers (non-half hour, half hour or sub half hour)

28. EIEP 13A:
 - (a) is an electronic file format used by a retailer to respond to a request from a consumer or its authorised agent for the consumer's consumption information
 - (b) is designed as a standardised electronic information exchange format to report a consumer's detailed (eg. HHR or sub half hour) consumption information, as well

² For example, if the requester has incorrectly identified the retailer as having previously supplied the relevant consumer.

³ See <http://www.ea.govt.nz/operations/retail/eiep/regulated-electricity-information-exchange-protocols/>

as a consumers NHH consumption information, where this information is available to the retailer

- (c) specifies a CSV file format intended for a machine to machine information transfer
 - (d) provides for detailed time period consumption information as a date and time series. The difference between the start date and time and end date and time for each record is the period that the reported consumption occurred over
 - (e) provides for the retailer to determine that the request is invalid (rejected), and return the EIEP type requested to the requester, with a valid rejection code included that identifies the reason for rejection of the specific ICP request
 - (f) is primarily expected to be used by agents but may also be requested by consumers.
29. Due to their large size, EIEP 13A format files must be transmitted electronically. This includes:
- (a) via the registry EIEP hub
 - (b) by email to a valid email address.
30. To receive consumption information in the EIEP 13A format via the EIEP hub, a consumer's agent must initially request access to the EIEP hub from the Authority. If the Authority approves the request, the agent will be required to agree to an access agreement and will be:
- (a) allocated a unique four-character non-participant identifier
 - (b) granted SFTP access to the EIEP hub.
31. For an EIEP hub transaction, an agent must query their allocated registry outbox to obtain requested consumption information. Further information about the EIEP hub can be found in the registry's [user manual and the registry functional specification](#).

EIEP 13B: Summary consumption information

32. EIEP 13B:
- (a) is an electronic file format used by a retailer to respond to a request from a consumer or authorised agent for the consumer's billed consumption information that the retailer has supplied to the consumer.
 - (b) is designed as a standardised electronic information exchange format to report a consumer's summary consumption information
 - (c) specifies a CSV file format intended for a machine to machine information transfer and extraction in a printed tabular format.

- (d) provides for summarised NHH consumption information as a date and time series. The difference between the start date and time and end date and time for each record is the period that the reported consumption occurred over
 - (e) provides for the retailer to determine that the request is invalid (rejected), and return the EIEP type requested to the requester, with a valid rejection code included that identifies the reason for rejection of the specific ICP request.
33. The manner in which information will be provided is electronic or hard copy by post, and will be chosen by the consumer or the consumer's agent and may be transferred via either:
- (a) the EIEP hub, in the case of a consumer's agent ; or
 - (b) a valid email address; or
 - (c) hard copy posted to the consumer.
34. The Authority recognises that retailers may wish to develop alternative ways to provide the information contained in EIEP13B to their consumers. For this reason, EIEP 13B only applies where a consumer has requested the information and the retailer does not already make equivalent information available to consumers, at no cost, via the retailer's web site. If an agent requests EIEP 13B, the retailer must provide EIEP 13B in the manner stated in paragraph 33.

EIEP 13C: Electronic request format for EIEP 13A or EIEP 13B

35. EIEP 13C:
- (a) is an electronic file format used to request consumption information from a retailer
 - (b) is primarily designed for use by an agent (which could include another retailer) authorised by the consumer to act on its behalf
 - (c) specifies a CSV file format intended for a machine to machine information request
 - (d) can be transmitted to the retailer via the EIEP hub
 - (e) allows an agent to request consumption information for consumers and formatted using either EIEP 13A, EIEP 13B or both .
36. If a retailer receives an EIEP 13C-formatted request, the retailer must assure itself that:
- (a) the EIEP 13C format has been complied with
 - (b) the request is valid in respect of consumer and ICP details
 - (c) the requester is properly authorised by the consumer(s).

37. If the retailer determines that the request is valid (accepted), it must transmit an electronic file containing the consumption information to the requester, formatted using the requested file format (either EIEP 13A, EIEP 13B or both).
38. The response, whether an acceptance or a rejection, can be transmitted to the requester via the EIEP hub.
39. To ensure that a repeat request for information is correctly processed, EIEP 13C contains a field for a unique number termed the "Consumer Authorisation code". This field is conditional, and is only required to be used if the retailer and agent have agreed a code. The Consumer Authorisation code may provide a time and consumer boundary within the retailer's system, to ensure that only the appropriate information is released.

Figure 1 – Example timeline showing consumption information that must be held and incorporating a retailer switch

Note: The example relates to a *new consumer* starting from 1 February 2016.

HOW MUCH CONSUMER CONSUMPTION INFORMATION MUST BE HELD BY A RETAILER?																	
Example Start Date	YYYY	MM	DD	Elapsed months from Start Date	RETAILER A			RETAILER B			CONSUMER INFORMATION ACCESS						
	2016	1	1		Date	Year	Month	Day	Status	Start date of information held (inclusive)	End date of information held (inclusive)	Maximum number of months of information held	Status	Start date of information held (inclusive)	End date of information held (inclusive)	Maximum number of months of information held	Number of months of historical information that can be requested NB: from switch date, may require consumer requests to both retailers
1/01/16	2016	1	1	0	Retailer A starts supplying the consumer			1/01/16									0
1/02/16	2016	2	1	1				1/01/16	31/01/16	1							1
1/03/16	2016	3	1	2				1/01/16	29/02/16	2							2
1/04/16	2016	4	1	3	Consumer information building up with Retailer A			1/01/16	31/03/16	3							3
...
1/12/17	2017	12	1	23				1/01/16	30/11/17	23							23
1/01/18	2018	1	1	24	Steady state operation after consumer has been with Retailer A for more than 24 months			1/01/16	31/12/17	24							24
1/02/18	2018	2	1	25				1/02/16	31/01/18	24							24
1/03/18	2018	3	1	26				1/03/16	28/02/18	24							24
1/04/18	2018	4	1	27				1/04/16	31/03/18	24							24
...
1/01/19	2019	1	1	36	Retailer A stops supplying the consumer			1/01/17	31/12/18	24	Retailer B starts supplying the consumer	none	none	0			24
1/02/19	2019	2	1	37				1/02/17	31/12/18	23		1/01/19	31/01/19	1			24
1/03/19	2019	3	1	38				1/03/17	31/12/18	22		1/01/19	28/02/19	2			24
1/04/19	2019	4	1	39	Consumer information winding down with Retailer A			1/04/17	31/12/18	21	Consumer information building up with Retailer B	1/01/19	31/03/19	3			24
...
1/11/20	2020	11	1	58				1/11/18	31/12/18	2		1/01/19	31/10/20	22			24
1/12/20	2020	12	1	59				1/12/18	31/12/18	1		1/01/19	30/11/20	23			24
1/01/21	2021	1	1	60	Retailer A obligation to hold consumer information ceases			none	none	0	Steady state operation after consumer has been with Retailer B for more than 24 months. And so on...	1/01/19	31/12/20	24			24
1/02/21	2021	2	1	61								1/02/19	31/01/21	24			24
1/03/21	2021	3	1	62								1/03/19	28/02/21	24			24